

**HOURIGAN, KLUGER & QUINN**  
A PROFESSIONAL CORPORATION

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IDENTIFICATION Nos. 01810; 53625; 204089; 309043

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IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

MARY ELIZABETH JORDAN  
FLICKINGER, O.D., and JAMES  
BRADLEY FLICKINGER, O.D.,  
Individually and as Parents and Natural  
Guardians of D.J.F., a minor and J.B.F.,  
a minor,

Plaintiffs

vs.

TOYS "R" US-DELAWARE, INC.,

Defendant

CIVIL ACTION – LAW

**JURY TRIAL DEMANDED**

No. 3:10-CV-00305

(JUDGE CAPUTO)

**PLAINTIFFS' SECOND AMENDED PRETRIAL DISCLOSURES IN**  
**ACCORDANCE WITH F.R.C.P. 26(a)(3)(A)(i)**

The following individuals may be called to testify on behalf of Plaintiffs at the time of trial in the above-captioned matter. Plaintiffs intend to call all witnesses to offer live testimony, but also reserve the right to offer the depositions of those individuals who have been or will be deposed. Witnesses who may be called on behalf of Plaintiffs at the time of trial include the following:

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Furthermore, Plaintiffs reserve the right to call any of the following:

Records Custodians for any/all records produced and/or identified during discovery.

Individuals identified by any party.

Any and all individuals deposed, including the right to call as of cross-examination witnesses deposed by Plaintiffs.

Any and all past or present directors, officers, board members and/or administrators of the defendant entity.

Any/all individuals who executed verifications to any pleadings and/or discovery.

Those individuals who approved and/or authored documents exchanged and/or identified during the course of discovery.

Any individual referred to and/or identified during the course of discovery and/or in documents produced during discovery by any party.

Current and/or former employees, agents and/or servants of the Defendant entity.

Defendants individually and/or by and through the corporate designees and/or representatives for the defendant entity.

Any current party to this action.

Family and friends of Plaintiffs.

Any and all treating physicians and/or healthcare/treatment providers identified in the medical records of Mary Elizabeth Jordan-Flickinger.

Anyone identified in Plaintiffs' Complaint.

All individuals previously listed in Plaintiffs' Rule 26 Disclosure Preliminary Statement.

Plaintiffs further reserve the right to call any and all individuals identified on Defendant's witness list not already identified herein.

***Plaintiffs reserve the right to supplement this witness list up to and including the time of trial.***

HOURIGAN, KLUGER & QUINN, P.C.

BY /s/ Kevin C. Quinn  
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